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16 Attorneys for Defendant  
17 EDDY URBINA

18  
19 IN THE UNITED STATES DISTRICT COURT  
20  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22  
23 SAN FRANCISCO DIVISION  
24

25 **UNITED STATES OF AMERICA,**

26 Plaintiff,

27 v.

28 **EDDY URBINA et al.,**

Defendant(s).

Case Number: 18CR0119-RS

**DEFENDANT'S JOINDER TO  
DEFENDANT REBOLLEDO'S  
REPLIES TO THE  
GOVERNMENT'S RESPONSE  
AND OPPOSITION TO MOTIONS  
FOR DISCLOSURE REGARDING  
THE GRAND JURY AND  
DISCOVERY**

Date: June 22, 2020  
Time: 10:00 am  
COURT: Joseph C. Spero, U.S. Mag.  
Judge

1 Mr. Urbina moves to join in replies to (1) the government's response and opposition to the motion  
2 for discovery and (2) the government's response and opposition to the motion for disclosure regarding the  
3 grand jury, both filed by his co-defendant Mr. Rebolledo.

4 In his motion and reply regarding the necessity for disclosure of the transcript of the prosecutor's  
5 charging instructions to the grand jury, Mr. Rebolledo argues that he has a particularized need for them  
6 because of the complexity of the charges before the grand jury. Mr. Urbina agrees. Here, where  
7 prosecutor's charging instructions to the grand jury raise important questions the answers to which may  
8 form the basis of a motion to dismiss the indictment, the need for the disclosure--to ensure the validity of  
9 the indictment—is significant. And this need outweighs the need for any secrecy because the government  
10 has already arrested and indicted the defendants it intended to charge.  
11

12 For all the reasons stated in Mr. Rebolledo's replies, which apply with equal force to Mr. Urbina,  
13 and based on the record herein, the Court should exercise its discretion and order the government to  
14 produce discovery and grand jury materials as requested by the defense in prior pleadings.  
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16  
17 Respectfully submitted,

18 Dated: June 2, 2020

19 /s/ Shaffy Moeel  
SHAFFY MOEEL  
Attorney for Defendant

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21 /s/ James S. Thomson  
JAMES S. THOMSON  
Attorney for Defendant  
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